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8  
9 **UNITED STATES DISTRICT COURT**  
10 **CENTRAL DISTRICT OF CALIFORNIA, SOUTHERN DIVISION**

11 JANE PCNE DOE, an individual; and  
12 JOHN PCNM DOE, an individual.

13 Plaintiff,

14 v.

15 USA GYMNASTICS, a Business Entity  
of form unknown; UNITED STATES  
16 OLYMPIC COMMITTEE, a Business  
Entity of form unknown; and DOES 3  
17 through 500.

18 Defendants.  
19  
20

Civil Case No. 2:18-cv-03464-JLS-KESx

**DEFENDANT USA GYMNASTICS'**  
**NOTICE OF ENTRY OF**  
**BANKRUPTCY COURT ORDER**  
**STAYING THIS ACTION IN ITS**  
**ENTIRETY**

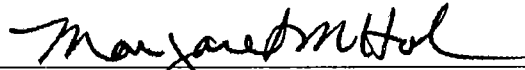
21 TO THE HONORABLE COURT, ALL PARTIES AND THEIR  
22 ATTORNEYS OF RECORD HEREIN:

23 PLEASE TAKE NOTICE that on April 22, 2019, the Honorable Robyn L.  
24 Moberly, United States Bankruptcy Judge for the United States Bankruptcy Court in  
25 the Southern District of Indiana, entered an Order granting debtor USA  
26 GYMNASTICS ("USAG") April 17, 2019 Motion for Entry of an Order Approving  
27 an Agreed-to Stipulation and Order Pursuant to 11 U.S.C. § 105 Enjoining the  
28 Continued Prosecution of Certain Pre-Petition Lawsuits. By way of this Order, this

1 lawsuit is stayed in its entirety. A true and correct copy of this Order is attached  
2 hereto as Exhibit 1.

3 Dated: April 9<sup>th</sup> 2019

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By: 

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EXHIBIT 1

SO ORDERED: April 22, 2019.



  
Robyn L. Moberly  
United States Bankruptcy Judge

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

In re:

USA GYMNASTICS,<sup>1</sup>

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**AGREED STIPULATION AND ORDER PURSUANT TO 11 U.S.C. §105 ENJOINING  
THE CONTINUED PROSECUTION OF CERTAIN PRE-PETITION LAWSUITS**

This matter came before the Court on the *Motion For Entry of an Order Approving an Agreed Stipulation and Order Pursuant to 11 U.S.C. §105 Enjoining The Continued Prosecution of Certain Pre-Petition Lawsuits* (the “**Motion**”), filed by USA Gymnastics as debtor and debtor

<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 7871. The location of the Debtor’s principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

in possession (the “**Debtor**”); the Court finding that (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §1334; (ii) this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O); (iii) the relief requested in the Motion is in the best interests of the Debtor, its estate, and creditors; and (iv) after due deliberation, and good and sufficient cause appearing therefore, the Court hereby determines the Motion should be GRANTED.

IT IS HEREBY STIPULATED AND AGREED:

1. Attached hereto as Exhibit 1 is a list of lawsuits (collectively, the “**Lawsuits**”) currently pending against the Debtor and/or various third-parties set forth on Exhibit 2 hereto (collectively, the “**Third Parties**”), alleging that the Debtor and the named Third Parties are liable to the plaintiff on account of sexual abuse perpetrated against the plaintiff.

2. Although the Lawsuits are stayed to the extent that they seek relief against the Debtor pursuant to 11 U.S.C. §362(a), the Lawsuits are not stayed against the Third Parties named in these lawsuits.

3. Some of the Third Parties named in the Lawsuits have alleged that the Debtor is obligated to indemnify the Third Party from any loss incurred as a result of the pending lawsuits, including attorney’s fees. Some of the Third Parties have alleged that they have rights under the Debtor’s insurance policies and/or are named insureds under the Debtor’s insurance policies. Some of the plaintiffs in the Lawsuits have alleged that the Debtor is responsible for any liability attributed to some of the Third Parties.

4. As a result, if the Lawsuits against the Third Parties are not stayed, the Debtor may be required to participate in discovery and/or incur expense providing a defense for the named Third Parties. In addition, the Debtor’s interest in its insurance policies may be impacted by the continued prosecution of the Lawsuits.

5. The signatories to this Order have agreed that the entry of an injunction pursuant to 11 U.S.C. §105(a) and the Seventh Circuit's decision in *Caesar's Entertainment Operating Corp. v. BOKF, N.A.*, 808 F.3d 1186 (7th Cir. 2015), will enhance the prospects of a successful reorganization, subject to the following terms:

- (a) During the time period while the injunction entered pursuant to this Order is in effect and further, provided that the Court has not declined to extend the time period to remove civil actions pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure, the Debtor will not seek to remove any Lawsuit that is currently pending in state court to federal court.
- (b) During the time period while the injunction entered pursuant to this Order is in effect, no signatory to this Order or the Sexual Abuse Survivors Committee will oppose a motion brought by the Debtor seeking to extend the time period to remove civil actions pursuant to Rule 9027 of the Federal Rules of Bankruptcy Procedure.
- (c) Any signatory to this Order may withdraw its consent to the injunction by providing ten business days' notice in writing to the other signatories to this Order. In the event that such notice is given, the Debtor may seek to obtain the entry of an injunction against such withdrawing party and the injunction contained in this Order shall remain in effect until the later of: (i) the expiration of the ten business days' notice period, if no further injunctive relief against the withdrawing party is sought by the Debtor; or (ii) in the event the Debtor seeks further injunctive relief against the withdrawing party, until the Court can decide the Debtor's request for further injunctive relief.



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1828723	278 <sup>th</sup> Judicial District Court Walker County, Texas	David H. Berg at Berg & Androphy
1829021	278 <sup>th</sup> Judicial District Court Walker County, Texas	James Harrington of Fieger, Fieger, Kenney & Harrington, P.C. and Bennie Rush of Law Offices of Bennie D. Rush, P.C.
17-cv-00029, 18-cv-01055 18-cv-01346	United States District Court Western District of Michigan Southern Division	Drew, Cooper & Anding and Manly, Stewart & Finaldi
17-cv-00222, 18-cv-01029, 18-cv-01347	United States District Court Western District of Michigan Southern Division	Manvir Grewal at Grewal Law PLLC
17-cv-00244, 18-cv-01049, 18-cv-01350	United States District Court Western District of Michigan Southern Division	Andrew Abood at Abood Law Firm
17-cv-00254, 18-cv-01041, 18-cv-01349	United States District Court Western District of Michigan Southern Division	James Graves at Sinas, Dramis, Brake, Boughton & McIntyre, P.C.
17-cv-00257, 18-cv-01052, 18-cv-01348	United States District Court Western District of Michigan Southern Division	James White at White Law PLLC
17-cv-00676, 18-cv-01037, 18-cv-01351	United States District Court Western District of Michigan Southern Division	Thomas W. Waun at Johnson Law PLC
17-cv-00684, 18-cv-01044	United States District Court Western District of Michigan Southern Division	Brian McKeen at McKeen & Associates, P.C.
18-cv-00173, 18-cv-01120	United States District Court Western District of Michigan Southern Division	Louis G. Corey at The Corey Law Firm
18-cv-00174, 18-cv-01121	United States District Court Western District of Michigan Southern Division	Louis G. Corey at The Corey Law Firm
18-cv-00188, 18-cv-01122	United States District Court Western District of Michigan Southern Division	Louis G. Corey at The Corey Law Firm
18-cv-00256, 18-cv-01049	United States District Court Western District of Michigan Southern Division	Andrew Abood at Abood Law Firm

Case Number	Court	Plaintiff Attorney and Law Firm
18-cv-00377, 18-cv-01123	United States District Court Western District of Michigan Southern Division	Louis G. Corey at The Corey Law Firm
18-cv-00385, 18-cv-01022	United States District Court Western District of Michigan Southern Division	David Houbeck at Vandevveer Garzia, PC
18-cv-00397, 18-cv-01034, 18-cv-01314	United States District Court Western District of Michigan Southern Division	Lisa M. Esser at Sommers Schwartz, PC
18-cv-00433, 18-cv-01059, 18-cv-01352	United States District Court Western District of Michigan Southern Division	White, Rusek, Nichol at White Law PLLC; Aziz at Abraham et al firm; Tuegel of Hunt & Tuegel
18-cv-00491	United States District Court Western District of Michigan Southern Division	Manvir Grewal at Grewal Law PLLC
18-cv-00494, 18-cv-01124	United States District Court Western District of Michigan Southern Division	Louis G. Corey at The Corey Law Firm
18-cv-00640	United States District Court Western District of Michigan Southern Division	Thomas Behm at Gruel Mills Nims & Pylman PLLC
18-cv-00694	United States District Court Western District of Michigan Southern Division	Michael S. Krzak at Krzak Rundio Law Group; Mark Schwartz at Driggers, Schultz & Herbst
18-cv-00732	United States District Court Western District of Michigan Southern Division	Michael A. Cox at The Mike Cox Law Firm, PLLC
18-cv-00734	United States District Court Western District of Michigan Southern Division	Jennifer G. Damico at Mike Morse Law Firm, PLLC
18-cv-00758	United States District Court Western District of Michigan Southern Division	Adam Kochenderfer at Wolfson Bolton PLLC
18-cv-00773	United States District Court Western District of Michigan Southern Division	Geoffrey Fieger at Fieger, Fieger, Kenney & Harrington, P.C.
18-cv-00806	United States District Court Western District of Michigan Southern Division	The Miller Law Firm Hilliard Martinez Gonzales, LLP Newman Hilliard Pritchett
18-cv-00822	United States District Court Western District of Michigan Southern Division	Richard Cascarilla at Murphy & Spagnuolo, P.C.
18-cv-00828	United States District Court Western District of Michigan Southern Division	Todd Weglarz at Fieger Law

Case Number	Court	Plaintiff Attorney and Law Firm
18-cv-00831	United States District Court Western District of Michigan Southern Division	Donna Mackenzie at Olsman, Mackenzie, Peacock & Wallace, P.C.
18-cv-00842	United States District Court Western District of Michigan Southern Division	Wendy Schiller-Nichols at The Nichols Law Firm, PLLC
18-cv-00851	United States District Court Western District of Michigan Southern Division	Wendy Schiller-Nichols at The Nichols Law Firm, PLLC
18-cv-00886	United States District Court Western District of Michigan Southern Division	Devin R. Day at Rizzobryan, P.C.
18-cv-00887	United States District Court Western District of Michigan Southern Division	Anthony Spagnuolo at The Law Office of Anthony M. Spagnuolo
18-cv-00915	United States District Court Western District of Michigan Southern Division	Jami Jones at Jami Jones PLLC
18-cv-00922	United States District Court Western District of Michigan Southern Division	Richard Cascarilla at Murphy & Spagnuolo, P.C.
18-cv-00944	United States District Court Western District of Michigan Southern Division	Donna Mackenzie at Olsman, Mackenzie, Peacock & Wallace, P.C.
18-cv-00965, 18-cv-01037	United States District Court Western District of Michigan Southern Division	Thomas Waun of Johnson Law
18-cv-00968	United States District Court Western District of Michigan Southern Division	Robert J. Lantzy at Buckfire & Buckfire, P.C.
18-cv-00978	United States District Court Western District of Michigan Southern Division	Efstathios T. Kiouisis at Kiouisis Law PC
18-cv-00981	United States District Court Western District of Michigan Southern Division	Richard A. Cascarilla at Murphy & Spagnuolo, P.C.
18-cv-00982	United States District Court Western District of Michigan Southern Division	Mark Bernstein at The Sam Bernstein Law Firm PLLC
18-cv-00987	United States District Court Western District of Michigan Southern Division	Marc Lipton at Lipton Law Center P.C.
18-cv-00993	United States District Court Western District of Michigan Southern Division	Jamie Nisidis at Braun Kendrick Finkbeiner PLC

Case Number	Court	Plaintiff Attorney and Law Firm
18-cv-00999	United States District Court Western District of Michigan Southern Division	Jessica Rieffel at Gower Law PLC
18-cv-01004	United States District Court Western District of Michigan Southern Division	Gregory Bereznoff at Law Offices of Bereznoff & Little
18-cv-01005	United States District Court Western District of Michigan Southern Division	Gregory M. Bereznoff at Law Offices of Bereznoff & Little
18-cv-01007	United States District Court Western District of Michigan Southern Division	Paul Grant of Planning with a Purpose and Matthew Ferri
18-cv-01008	United States District Court Western District of Michigan Southern Division	Wendy Schiller-Nichols at The Nichols Law Firm, PLLC
18-cv-01010	United States District Court Western District of Michigan Southern Division	Donna Mackenzie at Olsman, Mackenzie, Peacock & Wallace, P.C.
18-cv-01012	United States District Court Western District of Michigan Southern Division	David W. Christensen, Mary Pat Rosen at Charfoos & Christensen, P.C.
18-cv-01013	United States District Court Western District of Michigan Southern Division	Anthony Spagnuolo at The Law Office of Anthony M. Spagnuolo
18-cv-01014	United States District Court Western District of Michigan Southern Division	David Miller at Saeed & Little, LLP
18-cv-01016	United States District Court Western District of Michigan Southern Division	Jeffrey Stewart of Seikaly Stewart & Bennett
18-cv-01018	United States District Court Western District of Michigan Southern Division	Thomas Behm at Gruel Mills Nims & Pylman PLLC
18-cv-01019	United States District Court Western District of Michigan Southern Division	Wendy Schiller-Nichols at The Nichols Law Firm, PLLC
18-cv-01024	United States District Court Western District of Michigan Southern Division	Deborah L. Gordon at Deborah Gordon Law
18-cv-01025	United States District Court Western District of Michigan Southern Division	Michael P. Misch at Anderson Agostino & Keller
18-cv-01027	United States District Court Western District of Michigan Southern Division	Caleb Marker and Ben Gubernick at Zimmerman Reed LLP

Case Number	Court	Plaintiff Attorney and Law Firm
18-cv-01029	United States District Court Western District of Michigan Southern Division	Manvir Grewal at Grewal Law PLLC
18-cv-01036	United States District Court Western District of Michigan Southern Division	Jennifer G. Damico at Mike Morse Law Firm, PLLC
18-cv-01038	United States District Court Western District of Michigan Southern Division	Michael Pitt at Pitt, McGehee, Palmer & Rivers P.C.
18-cv-01039	United States District Court Western District of Michigan Southern Division	April Kreger at The Coleman Justice Center
18-cv-01044	United States District Court Western District of Michigan Southern Division	Brian McKeen at McKeen & Associates, P.C.
18-cv-01045	United States District Court Western District of Michigan Southern Division	Robert C. Hilliard at Hilliard Martinez Gonzales, LLP and E. Powell Miller at The Miller Law Firm, P.C.
18-cv-01047	United States District Court Western District of Michigan Southern Division	Brian McKeen at McKeen & Associates, P.C.
18-cv-01049	United States District Court Western District of Michigan Southern Division	Andrew Abood at Abood Law Firm
18-cv-01051, 18-cv-01055	United States District Court Western District of Michigan Southern Division	Drew, Cooper & Anding and Manly, Stewart & Finaldi
18-cv-01052	United States District Court Western District of Michigan Southern Division	James White at White Law PLLC
18-cv-01054	United States District Court Western District of Michigan Southern Division	Michael Gatti at David & Gatti
18-cv-01057	United States District Court Western District of Michigan Southern Division	Robert Darling at Robert H. Darling, PLLC and Joseph Fraser at Law Offices of Johnston, Szykiel, & Hunt, P.C.
18-cv-01058	United States District Court Western District of Michigan Southern Division	Robert Darling at Robert H. Darling, PLLC and Joseph Fraser at Law Offices of Johnston, Szykiel, & Hunt, P.C.
18-cv-01060	United States District Court Western District of Michigan Southern Division	Joseph Fraser of Johnston, Szykiel & Hunt, P.C.



Case Number	Court	Plaintiff Attorney and Law Firm
18-cv-01258	United States District Court Western District of Michigan Southern Division	Thomas Behm at Gruel Mills Nims & Plyman PLLC
18-cv-01296	United States District Court Western District of Michigan Southern Division	Richard Cascarilla at Murphy & Spagnuolo, P.C.
18-cv-01059	United States District Court Western District of Michigan Southern Division	White, Rusek, Nichol of White Law; Aziz of Abraham et al firm; Tuegel of Hunt & Tuegel
18-cv-01169	United States District Court Western District of Michigan Southern Division	Jami Jones at Jami Jones PLLC
18-cv-00642, 18-cv-01056	United States District Court Western District of Michigan Southern Division	Robert Darling, Christopher Ambrose, Joseph Fraser
2:18-cv-03462-JSL-KES	United States District Court Central District of California Western Division – Los Angeles	John C. Manly at Manly, Stewart & Finaldi
2:18-cv-03464-JLS-KES	United States District Court Central District of California Western Division – Los Angeles	John C. Manly at Manly, Stewart & Finaldi
30-2017-00899357	Superior Court of the State of California in and for the County of Orange	John C. Manly at Manly, Stewart & Finaldi
30-2018-01019592	Superior Court of the State of California in and for the County of Orange	John C. Manly at Manly, Stewart & Finaldi
5:18-cv-02479-BLF	United States District Court California Northern District San Jose Division	John C. Manly at Manly, Stewart & Finaldi
8:18-cv-1117-JLS-KES	United States District Court Central District of California Southern Division – Santa Ana	John C. Manly at Manly, Stewart & Finaldi
8:18-cv-00650-JLS-KES	United States District Court Central District of California Southern Division – Santa Ana	John C. Manly at Manly, Stewart & Finaldi
BC706935	Superior Court of the State of California in and for the County of Los Angeles	John C. Manly at Manly, Stewart & Finaldi

Case Number	Court	Plaintiff Attorney and Law Firm
2:19-cv-00171-JLS-KES	United States District Court Central District of California Western Division – Los Angeles	Jesse Creed at Panish Shea & Boyle LLP and co-counsel Muhammad Aziz at Abraham, Watkins, Nichols, Sorrels, Agosto & Aziz, and Michelle Simpson Tuegel
2:18-cv-10540-JLS-KES	United States District Court Central District of California Western Division – Los Angeles	Whitney D. Ackerman and Jonathan A. Rapel at The Law Office of Whitney D. Ackerman
2:18-cv-03461-JLS-KES	United States District Court Central District of California Western Division – Los Angeles	John C. Manly, Vince W. Finaldi, Alex Cunny at Manly, Stewart & Finaldi
8:18-cv-01136-JLS-KES	United States District Court Central District of California Southern Division – Santa Ana	John C. Manly, Vince W. Finaldi, Alex Cunny at Manly, Stewart & Finaldi
2:19-cv-00161-JLS-KES	United States District Court Central District of California Western Division – Los Angeles	Kevin R. Boyle and Jesse Creed at Panish Shea & Boyle LLP and co-counsel Muhammad Aziz at Abraham, Watkins, Nichols, Sorrels, Agosto & Aziz, and Michelle Simpson Tuegel
2:19-cv-00167-JLS-KES	United States District Court Central District of California Western Division – Los Angeles	Kevin R. Boyle and Jesse Creed at Panish Shea & Boyle LLP and co-counsel Muhammad Aziz at Abraham, Watkins, Nichols, Sorrels, Agosto & Aziz, and Michelle Simpson Tuegel
5:19-cv-00110-LHK	United States District Court California Northern District San Jose Division	Kevin R. Boyle and Jesse Creed at Panish Shea & Boyle LLP and co-counsel Muhammad Aziz at Abraham, Watkins, Nichols, Sorrels, Agosto & Aziz, and Michelle Simpson Tuegel
2018L008869	Circuit Court of Cook County, Illinois, County Department, Law Division	Muhammad Aziz of Abraham, Watkins, Nichols, Sorrels, Agosto & Aziz
1:19-cv-00737-KMT	United States District Court District of Colorado	Vance Andrus, Aimee Wagstaff, Kimberly Dougherty, and Lisa Lee at Andrus Wagstaff, P.C.; Megan A. Bonanni at Pitt, McGehee, Palmer & Rivers, P.C., Thomas R. Behm at Gruel Mills Nims & Pylman PLLC, and Melissa Fry Hague at Goldman Scarlato & Penny

Case Number	Court	Plaintiff Attorney and Law Firm
1:19-cv-00902	United States District Court District of Colorado	Vance R. Andrus, Aimee H. Wagstaff, Kimberly A. Dougherty and Lisa Lee at Andrus Wagstaff, P.C.; Robert J. Lantzy at Buckfire & Buckfire, PC; Donna M. MacKenzie at Olsman Mackenzie Peacock & Wallace, PC; Robert H. Darling at Robert H. Darling, PLLC; Joseph N. Fraser at Law Offices of Johnston, Szykiel & Hunt, P.C.; Jennifer B. Salvatore at Salvatore Prescott & Porter, PLLC; Michael A. Cox and Jackie J. Cook at The Mike Cox Law Firm, PLLC; Gregory M. Bereznoff at Law Offices of Bereznoff & Little; David L. Zoglio at Law Offices of David L. Zoglio; Mary Pat Rosen and David W. Christensen at Charfoos & Christensen, P.C.; Mark K. Schwartz at Driggers, Schultz & Herbst; Michael S. Krzak and Matthew M. Rundio at Krzak Rundio Law Group, LLC; Gary L. Bender and Richard A. Cascarilla at Murphy & Spagnuolo, P.C.; Jordan K. Merson and Jaclyn M. Ponish at Merson Law, PLLC; Paul H. Grant at Planning With Purpose, Inc.; Matthew A. Ferri at Law Office of Matthew A. Ferri, PLLC; Steven A. Lee at Neumann Law Group; Jessica Rose Ross at Gower Law PLC; Debra A. Freid at Freid, Gallagher, Taylor & Assoc., P.C.; Nicholas Roumel at Nacht & Roumel, P.C.; Efsthios T. Kiouisis at Kiouisis Law, P.C.; Jami Jones at Jami Jones PLLC; Tiffany R. Ellis and Jeffrey T. Stewart at Seikaly, Stewart, & Bennett, P.C.; Wendy M. Schiller-Nichols and Matthew J. Heos at The Nichols Law Firm, PLLC; and Mark Bernstein, Rebecca Sposita and Michael Battersby at The Sam Bernstein Law Firm, PLLC
1:18-cv-11299-IT	United States District Court District of Massachusetts	Vance Andrus, Kimberly Dougherty, Aimee Wagstaff at Andrus Wagstaff, P.C.
18-cv-0147	United States District Court Western District of Michigan	Jordan Merson and Jaclyn Ponish at Merson Law, PLLC

**EXHIBIT 2**

**List of Third Parties**

- U.S. Olympic Committee
- Stephen Penny
- Twistars
- John Geddert
- Kathryn Geddert
- BMK Partners Ltd.
- BMK Training Facilities, Ltd.
- Karolyi Training Camps LLC
- Karolyi's Elite
- Bela Karolyi
- Martha Karolyi
- Debra Van Horn
- Edward Gerald Spinelli
- Champions Unlimited Gymnastics
- Training Center, LLC
- Kathy Scanlan
- Paul Parilla
- World Sport Chicago
- Robert Colarossi
- AOGC All Olympia Gymnastics Center Inc.
- Artur Akopyan
- Galina Marinova
- Donald Peters
- Southern California Acro Team
- Richard Carlson
- Lawrence F. Probst
- Robert J. Bach
- James M. Benson
- Robert Bowlsby
- Ursula M. Burns
- Anita L. DeFrantz
- Daniel I. Doctoroff
- James L. Easton
- John S. Hendricks
- Nina M. Kemppe
- Susanne D. Lyons
- William C. Marlot
- Mary R. McCagg
- Steven M. Mesler
- Dave W. Ogrea
- Pisei Whitney Ping
- Angela M. Ruggiero
- Kevin M. White
- Robert L. Wood
- Scott Blackmun
- Alan Ashley
- Larry Buendorf

**CERTIFICATE OF SERVICE**

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is Clyde & Co US LLP, 2020 Main Street, Suite 1100, Irvine, California 92614.

Pursuant to FRCP 5, I certify that I am a legal assistant at Clyde & Co US LLP and that on April 23, 2019, I served the within document(s): **DEFENDANT USA GYMNASTICS' NOTICE OF ENTRY OF BANKRUPTCY COURT ORDER STAYING THIS ACTION IN ITS ENTIRETY**

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address [krista.gutierrez@clydeco.us](mailto:krista.gutierrez@clydeco.us) to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

**BY U.S. MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Clyde & Co US LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Irvine, California.

**FEDERAL** - I certify under penalty of perjury under the law of the United States of America that the foregoing is true and correct.

Executed on April 23, 2019, at Irvine, California.

  
Krista Gutierrez

CLYDE & CO US LLP  
2020 Main Street, Suite 1100  
Irvine, California 92614  
Telephone: (949) 852-8200

**SERVICE LIST**

***Jane PCNE Doe & John PCNM Doe v. USOC, et al. al.***  
**U.S.D.C. Case No.: 2:18-cv-03462-JLS-KESx**

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Udit Sood COVINGTON & BURLING, LLP One Front Street, 35th Floor San Francisco, CA 94111-5356 Telephone: 415.591.6000 Facsimile: 415.591.6091 <a href="mailto:usood@cov.com">usood@cov.com</a>	<b><i>Attorneys for Defendant, UNITED STATES OLYMPIC COMMITTEE</i></b>  <b>VIA EMAIL ONLY</b>
Lawrence Gerard Nassar (#21504-040) USP-Coleman II U.S. Penitentiary PO Box 1034 Coleman, FL 33521	<b><i>Defendant LARRY NASSAR</i></b>  <b>VIA US MAIL ONLY</b>

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